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Reply to  
Nashville Office

July 1, 2004

Chairman Deborah Taylor Tate  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

RE: Motion to Consolidate IRM Utility, Inc.'s Petitions to amend Certificate of Convenience and Necessity – Docket No. 04-00101, Docket No. 04-00152, Docket No. 04-00153

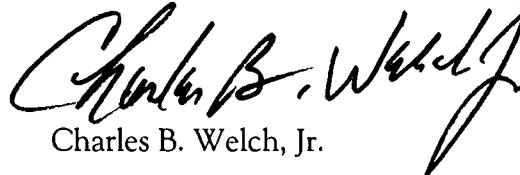
Dear Chairman Tate:

Please find enclosed an original and 17 copies of the above referenced motion. IRM Utility, Inc. has filed a motion to consolidate the referenced Dockets and submits this filing in anticipation of consolidation in an effort to avoid a multiple, voluminous filings. Please date and stamp a copy for our records.

Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN  
BOBANGO HELLEN & DUNLAP, PLC



Charles B. Welch, Jr.

CBW/ale

**TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

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<b>IN RE:</b>	)	
	)	
<b>MOTION TO CONSOLIDATE</b>	)	
	)	
<b>PETITION OF IRM UTILITY, INC</b>	)	
<b>TO AMEND ITS CERTIFICATE</b>	)	<b>Docket No. 04-00101</b>
<b>OF CONVIENCE AND NECESSITY</b>	)	
	)	
<b>and</b>	)	
	)	
<b>PETITION OF IRM UTILITY, INC</b>	)	
<b>TO AMEND ITS CERTIFICATE OF</b>	)	<b>Docket No. 04-00152</b>
<b>CONVIENCE AND NECESSITY</b>	)	
	)	
<b>and</b>	)	
	)	
<b>PETITION OF IRM UTILITY, INC.</b>	)	
<b>TO AMEND ITS CERTIFICATE OF</b>	)	<b>Docket No. 04-00153</b>
<b>CONVIENCE AND NECESSITY</b>	)	

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**MOTION FOR CONSOLIDATION**

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IRM Utility, Inc. ("IRM") by and through undersigned counsel, petitions the Tennessee Regulatory Authority to consolidate the following petitions to amend its Certificate of Convenience and Necessity. In support of its motion, IRM states as follows:

1. The Dockets subject to consolidation are:

(A) Docket No. 04-00101 – Petition to expand its service area to include a portion of Roane County, Tennessee known as Emory Point;

(B) Docket No. 04-00152 – Petition to expand its service area to include a portion of Knox County, Tennessee known as Lot 23 – The River Club subdivision; and

(C) Docket No. 04-00153 – Petition to expand its service area to include a portion of Jefferson County, Tennessee known as Wild Pear Shores subdivision

2. This issue of IRM's capability to serve the proposed service area and the public interest are the threshold issues in each of the pending dockets.

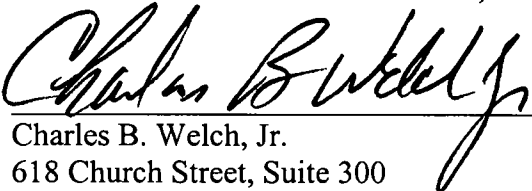
3. Consolidation of these dockets will avoid unnecessary, duplicate filings of identical documents.

4. In the interest of judicial economy, consolidation will avoid multiple hearings and repetitive staff review of similar, if not identical issues, and, therefore, is more time and cost efficient.

**WHEREFORE, PREMISES CONSIDERED,** IRM prays that is be granted the consolidation.

DATED this 1<sup>st</sup> day of July, 2004.

Respectfully submitted,  
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